

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

FROST SOLUTIONS, LLC,

Plaintiff,

v.

PATRICK BAGLIEN, CHRISTOPHER
LAREAU, and VUE ROBOTICS, LLC,

Defendants.

Civil Action No. 1:22-cv-00401-SE

**JOINT MOTION TO EXTEND DEADLINES
IN THE DISCOVERY PLAN AND CONTINUE TRIAL**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and Local Rules 7.1 and 7.2, Plaintiff Frost Solutions, LLC (“Frost”), and Defendants Patrick Baglien, Christopher Lareau, and Vue Robotics, LLC (collectively with Frost, the “Parties”), by and through their respective counsel, hereby move to extend the remaining deadlines in this action, as set forth below and in the Civil Form 3 being filed herewith. In support of this Joint Motion, the Parties state as follows:

1. As stated in the Parties’ Joint Motion to Extend Deadlines in the Discovery Plan and Continue Trial (Doc. 91), which the Court approved by Order dated October 1, 2024, following an unsuccessful mediation last July, the Parties resumed discovery in this case. In response to several third-party subpoenas which Frost had originally served prior to the mediation, the subpoenaed parties recently produced responsive documents, numbering well over 200,000 pages of documents.

2. The Parties have also been working cooperatively with respect to producing technical information related to the trade secret claims. That production has not been concluded as yet, but the Parties now anticipate that will be concluded by early March.

3. The current discovery schedule required expert disclosures by a party bearing the burden of proof by February 1, 2025, with overall discovery concluding May 15, 2025. Given the voluminous recent production, as well as the upcoming production on technical matters, the Parties were not in a position to provide expert disclosures by that date.

4. The current schedule (set forth in Doc. 91-1) also provided for expert disclosures well before the close of fact discovery. The Parties now agree that they would prefer for expert disclosures to be provided closer to the end of fact discovery, to ensure that the Parties' experts have fuller factual records.

5. Accordingly, the Parties are now requesting that fact discovery be extended from May 15 to August 22, 2025, with the deadline for initial expert disclosures moving from February 1 to August 1, 2025. These proposed extensions will necessarily extend other deadlines, as the Parties complete expert discovery. In addition, these proposed extensions will require continuing the trial currently scheduled for this Court's jury trial session starting November 18, 2025. The Parties propose that this case be scheduled for this Court's jury trial session starting March 17, 2026.

6. Pursuant to LR 7.2(a)(ii), the requested extensions to the current deadlines are listed below, and are also contained in the Civil Form 3 filed herewith in accordance with LR 7.2(a)(iii).

Scheduling Designation	Current Deadline	Proposed Deadline
Deadline to serve disclosures and initial expert reports by party who has the burden of proof	02/01/2025	08/01/2025
Completion of Fact Discovery	05/15/2025	08/22/2025
Deadline to serve rebuttal expert reports	03/01/2025	09/15/2025
Deadline for supplementation under Fed. R. Civ. P. 26(e)(2) for party with the burden of proof	05/14/2025	10/10/2025

Deadline for responsive supplementation under Fed. R. Civ. P. 26(e)(2)	06/15/2025	10/31/2025
Deadline to complete expert discovery	04/01/2025	10/31/2025
Deadline to file dispositive motions/summary judgment motions	07/01/2025	11/14/2025
Deadline to file challenges to expert testimony (no later than 45 days before trial)	06/01/2025	01/30/2026
Two-week jury trial session	11/18/2025	03/17/2026

7. Pursuant to LR 7.2(a)(i)-(ii), this Motion, if granted, will result in an extension of remaining discovery and other deadlines in the Discovery Plan as identified above.

8. This Motion, if granted, will result in the continuance of the trial in this case. Pursuant to LR 7.2(c), undersigned counsel hereby certifies that their clients have been notified of the reasons for the requested continuance and have assented thereto.

9. In accordance with LR 7.1(c), the Parties' counsel have conferred in good faith, and jointly request the relief sought in this Motion.

10. Pursuant to LR 7.1(a)(2), the Parties believe that a supporting memorandum is unnecessary because the relief requested herein is discretionary.

WHEREFORE, Plaintiff Frost Solutions, LLC and Defendants Patrick Baglien, Christopher Lareau, and Vue Robotics, LLC, through their respective counsel, respectfully request that the Court:

- (A) Grant this Joint Motion and extend the discovery deadlines and trial date, as set forth above and in the completed Civil Form 3 submitted herewith; and
- (B) Grant such other and further relief as the Court may deem just and equitable under the circumstances.

Dated: February 10, 2025

FROST SOLUTIONS, LLC,

By its attorneys,

/s/ Laura L. Carroll

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically served copies of this document and Civil Form 3 on all counsel of record via the Court's CM/ECF system.

Dated: February 10, 2025

/s/ Laura L. Carroll

Laura L. Carroll